SAVE OUR CANYONS

July 25, 2024

To: Wasatch Front Regional Council
Andrew Gruber, Executive Director
Wayne Bennion, Director of Short-Range Planning and Programming

Re: 2025-2030 Draft TIP Comment

Dear Wasatch Front Regional Council Short-Range Planning Team,

Thank you for the opportunity to comment on the Draft 2025-2030 Transportation Improvement Program (TIP).

Save Our Canyons is a local 501(c)3 nonprofit dedicated to protecting the beauty and wildness of the Wasatch Mountains, and has been invested in finding solutions to the transportation issues confronting our canyons for over 50 years. We greatly appreciate the work you do and share many of the same visions you have for the future of the Wasatch Front, especially as it pertains to fostering accessibility to natural spaces and providing convenient and affordable transportation options. The following comments discuss two specific projects identified in the TIP, as well as process-based recommendations to improve outcomes and communication with stakeholders and the public.

As the Utah Department of Transportation (UDOT) undertakes multiple transportation improvements in two of the most heavily trafficked canyons in the Wasatch Front, Little and Big Cottonwood Canyons (LCC and BCC, respectively), Save Our Canyons remains focused on ensuring equitable access and implementation of the “Cottonwood Canyons Enhanced Bus, Tolling, and Hub” project, valued at $176,800,000, and the “Big Cottonwood Canyon Environmental Study” project valued at $2,000,000 dollars.

We support all implementation of funding for enhanced bus service and the necessary accompanying infrastructure in both Big and Little Cottonwood Canyons. We also support the implementation of congestion-based tolling, as long as any tolling is accompanied by more frequent bus service at low or no cost precedes tolling in order to avoid pricing visitors out of the canyons. In addition, as congestion-based tolling is implemented in one canyon, it is critical that short-range planning accommodates for the interconnected relationship between transportation and visitorship in either canyon. For example, if tolling is introduced in one canyon before the other, it is logical to assume that visitorship will increase for nearby canyons without a toll, toward a cheaper option. Staggered implementation of tolling in one canyon could lead to overuse, and short range planning should accommodate for this reality by implementing any congestion-based tolling in both BCC and LCC simultaneously.

Since the Legislature has allocated $100 million from one-time General Funding and $50 million from the Cottonwood Canyons Transportation Investment Fund for enhanced bussing and tolling, it's crucial that this funding is used solely for projects already ID'd in the TIP. The $150 million, along with an additional $42 million from the previously approved Recreational Hot Spots Program, must be used only for implementation of projects ID'd in phases 1 and 2 of the LCC EIS process, such as enhanced bussing, tolling and the mobility hub. We encourage WFRC to support implementation of these projects, with metrics for successful implementation stated prior to their construction, so that data and goals can be established and achieved prior to inclusion or implementation of more costly, irreversible transportation projects in the same project area ID'd in the RTP.

During its May 2023 meeting, the Wasatch Front Regional Council adopted the 2023-2050 Regional Transportation Plan with the following statement of intent: "WFRC supports prioritizing of Phases 1 and 2 and implementation and evaluation of Phases 1 and 2 before advancing to Phase 3." Although well-intentioned, the statement fails to identify any metrics that might demonstrate what a successful Phase 1 and 2 look like. **As we build out Phase 1 implementation in the TIP, it is critical to define these metrics so we can set the projects up for success, whether it be through design elements or the necessary capital.** For example, metrics for success related to bussing could include a reduction in the total number of cars which travel on SR-210 during peak travel periods in the winter, compared to averages from previous years. Metrics for success related to tolling could include a measurement of the average number of people in a given car traveling on SR-210, compared to the average occupancy of a car in previous years. The community also deserves to know those metrics for the sake of accountability and transparency.

Throughout implementation of transportation improvement projects along the Wasatch Front, it is imperative that planning authorities take the following steps to ensure accountability and transparency for the best environmental outcomes of any project:

1. Collaborative, Stakeholder-Driven Environmental Review Processes

- **Conduct Thorough National Environmental Policy Act (NEPA) Analysis**: Before starting any project, conduct detailed environmental impact assessments to identify sensitive areas, native plant species, and wildlife habitats.
    - In UDOT's EIS of proposed transportation solutions in LCC, state agencies did not, to the degree the public expects, include a thorough analysis of reasonably foreseeable direct and indirect environmental impacts of selected alternatives.
    - In UDOT's upcoming environmental review of proposed transportation solutions in BCC, the following suggestions should be incorporated to allow for thorough analysis and best practices to minimize environmental impacts and improve accountability and transparency.
    - Prior to including any projects currently on WFRC's RTP in future Transportation Improvement Plans, we recommend that each project should undergo a more rigorous environmental review process with multiple opportunities for the public to review and comment on individual projects.

- **Involve Experts**: Collaborate with ecologists, botanists, and wildlife experts to understand the specific environmental context and potential impacts of any project.
- **Cumulative Impact Analysis**: Evaluate not only the direct impacts but also the cumulative effects of multiple projects on the ecosystem over time.
- **Collaborative Planning**: Work with recreational groups, conservationists, and public land agencies to develop plans that balance transportation needs with conservation and recreation.

2. Wildlife Protection and Habitat Connectivity

- **Wildlife Corridors**: Design and incorporate wildlife corridors and crossing structures such as overpasses and underpasses to maintain habitat connectivity and reduce wildlife-vehicle collisions.
- **Avoid Critical Habitats**: Route transportation projects away from critical habitats and breeding grounds for sensitive species whenever possible.
- **Monitoring and Mitigation**: Establish monitoring programs to track wildlife movements and the effectiveness of mitigation measures, adjusting strategies as needed.

3. Access to Public Lands and Recreation throughout construction

- **Trailhead Access**: Ensure that transportation improvements include access points to trailheads and recreational areas, with sufficient parking and facilities.
- **Integrated Trail Networks**: Integrate transportation planning with existing trail networks to provide safe, equitable and convenient access for hikers, cyclists, and backcountry users.
- **Seasonal Considerations**: Consider seasonal variations in recreational use and wildlife activity to minimize conflicts and disruptions.

4. Monitoring and Adaptive Management

- **Long-term Monitoring**: Establish long-term monitoring programs to assess the environmental and social impacts of transportation projects over time.
    - Create metrics for success related to projects funded by the CCTIF, such as the suggested metrics to measure efficacy of Phase 1 of UDOT's LCC phased implementation plan.
- **Adaptive Management**: Use monitoring data to inform adaptive management strategies, allowing for adjustments in project design and implementation to better meet conservation and access goals.

By implementing these best practices, transportation improvement projects along the Wasatch Front can achieve a balance between infrastructure development, environmental stewardship, and recreational access. Engaging with local stakeholders, leveraging innovative technologies, and prioritizing ecological preservation of wildlife habitats are essential steps in creating

sustainable and resilient transportation systems that can accommodate the increasing population along the Wasatch Front.

Collaboration with organizations like **Save Our Canyons** and adherence to these principles can help ensure that future projects not only meet transportation needs but also protect and enhance the natural beauty and ecological integrity of the Wasatch Mountains.

Thank you again for the thoughtful work you put into drafting the 2024-2029 TIP and for the opportunity to comment. We would enjoy the occasion to meet with WFRC staff to collaborate and further explore any of the concepts we discussed in our comments.

On behalf of our members and the community,

Spencer Shaver

Executive Director, Save Our Canyons